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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF ARIZONA**

9
10 CAROL ANN AGSTER, personal) No. CIV-02-1686-PHX-JAT
11 representative of the Estate of CHARLES)
12 J. AGSTER, III, deceased; CHARLES J.) **PLAINTIFFS' NOTICE OF**
13 AGSTER, JR., and CAROL ANN) **SUBMISSION OF FORM OF**
14 AGSTER, surviving parents of) **VERDICT**
15 CHARLES J. AGSTER, III,)
16 Plaintiffs,)
17 v.) (Assigned to the
18 MARICOPA COUNTY, a public entity;) Honorable James A. Teilborg)
19 MARICOPA COUNTY SHERIFF'S)
20 OFFICE, a division of Maricopa County;)
21 MARICOPA COUNTY DEPARTMENT)
22 OF CORRECTIONAL HEALTH)
23 SERVICES, a division of Maricopa)
24 County; JOSEPH M. ARPAIO,)
25 MARICOPA COUNTY SHERIFF;)
26 BETTY J. LEWIS, and JOHN DOE)
LEWIS, her husband; BARUCH A.)
REUSCH, and JANE DOE REUSCH, his)
wife; LEAH R. COMPTON, and JOHN)
DOE COMPTON, her husband;)
KRISTINE KEMPER, and JOHN DOE)
KEMPER, her husband; AMANDA S.)
GARRISON, and JOHN DOE)
GARRISON, her husband; SUSAN E.)

1 FISHER, and JOHN DOE FISHER, her)
2 husband; ERICK NULPH, and JANE)
3 DOE NULPH, his wife; KATHERINA)
4 BROKSCHMIDT, and JOHN DOE)
5 BROKSCHMIDT, her husband;)
6 MICHAEL C. WILKINS, and JANE)
7 DOE WILKINS, his wife; LAURA)
8 SODEMAN, and JOHN DOE)
9 SODEMAN, her husband; JOHN DOES)
10 I-X and JANE DOES I-X,)
11 Defendants.)

12 Pursuant to the Court's Order Setting Final Pretrial Conference, Plaintiffs hereby
13 submit their Proposed Form of Verdict, which is attached hereto.

14 RESPECTFULLY SUBMITTED this 14th day of December, 2005.

15 **STINSON MORRISON HECKER
16 LLP**

17 By: /s/ Sean B. Berberian
18 Michael C. Manning
19 Sean B. Berberian
20 1850 N. Central Avenue, Suite 2100
21 Phoenix, Arizona 85004-4584
22 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2005, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrant:

Brian Kaven, attorney for MCSO Defendants

Richard L. Strohm, attorney for Betty Lewis

Daniel P. Jantsch and Michael D. Wolver, attorneys for Maricopa County and CHS

I hereby certify that on December 14, 2005, I served a courtesy copy of the attached document by mail, upon:

The Honorable James A. Teilborg
Sandra Day O'Connor U.S. Courthouse, Ste 523
401 West Washington Street, SPC 51
Phoenix, Arizona 85003

/s/ Brooke Campbell